

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Jeffrey Luffman,
Plaintiff,

v.

Collinsville Community Unit School District #10, et al.,
Defendants.

Case No: 25-CV-842-SPM

RECEIVED

MAY 12 2025

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
E. ST. LOUIS OFFICE

**JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF'S CIVIL RIGHTS
COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

Plaintiff, Jeffrey S. Luffman, appearing pro se, respectfully submits this Judicial Notice to preserve in the record a new, ongoing development that materially affects Plaintiff's ability to report, document, or defend the allegations at the center of this civil rights case. This notice is not presented to argue new claims or reframe prior pleadings, but to inform the Court of active, external interference with Plaintiff's ability to access the public and government oversight necessary to petition for redress.

I. Background of Communication Suppression

Since the filing of this case, Plaintiff has submitted FOIA requests, legal complaints, and notices to oversight agencies, reporters, and government entities concerning:

- 1. Misuse of public funds;**
- 2. Improper filings of a now-terminated protective order (25OP611);**
- 3. Alleged civil rights violations by public actors; and**
- 4. Retaliatory suppression of speech, access, and due process.**

On May 11, 2025, Plaintiff attempted to forward evidence and filings to the Illinois State Board of Education (ISBE), the Illinois Attorney General Civil Rights Bureau, Madison County agencies, and over 40 media organizations. The emails were

systematically blocked by remote servers citing content “identified as spam,” with diagnostic code AS(4810) (See Exhibit A).

The email included:

- 1. Documentation of the improper use of the terminated order to trigger a platform takedown (JeffFreeTV);**
- 2. A detailed report regarding the use of public resources to retaliate against protected speech;**
- 3. A request for action by ISBE and Madison County, sent in advance of full system suppression (See Exhibit B).**

Before the suppression, the Illinois State Board of Education issued Incident Report #94265, confirming receipt of the Plaintiff’s May 11, 2025 submission and logging the civil rights allegations and takedown request (See Exhibit C).

II. Legal and Procedural Impact

This blocking now prevents Plaintiff from:

- 1. Contacting oversight agencies actively involved in reviewing Plaintiff’s prior complaints;**
- 2. Communicating with newsrooms and transparency groups regarding this matter;**
- 3. Delivering legal documentation and evidence updates to officials and agencies named in prior filings.**

Plaintiff respectfully notes that these blocked communications include:

- 1. Routine public inquiries;**
- 2. Non-commercial, verified Outlook messages; and**
- 3. Government- and media-facing addresses that Plaintiff has successfully used in the past.**

No prior notice of restriction was issued. The suppression is silent, systemic, and complete.

III. Purpose of this Judicial Notice

In alignment with the Court's guidance regarding piecemeal filings, this notice does not seek relief or attempt to re-argue previously submitted matters. It is submitted solely for the purpose of:

- 1. Preserving the evidentiary timeline;**
- 2. Establishing the escalating pattern of obstruction; and**
- 3. Documenting the factual context in which Plaintiff is now operating.**

Plaintiff respectfully submits that this development affects not only the litigation process, but Plaintiff's constitutional right to:

- 1. Petition the government (First Amendment);**
- 2. Communicate with press and oversight (First Amendment); and**
- 3. Pursue redress through lawful, non-violent, protected channels.**

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com

Dated: May 12, 2025

VERIFICATION

I, Jeffrey Luffman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements and information contained in this document and attached exhibits are true and correct to the best of my knowledge, information, and belief.

Executed this 12th day of May, 2025.

/s/ Jeffrey Luffman

Jeffrey Luffman
Pro Se Plaintiff
212 Camelot Dr.
Collinsville, IL 62040
(636) 675-4864
jeffrey.luffman@outlook.com

**Exhibit Index – JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF’S
CIVIL RIGHTS COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

Case No.: 25-cv-842-SPM

Plaintiff: Jeffrey Luffman

Defendants: Collinsville CUSD #10, et al.

Exhibits Attached

- 1. Exhibit A: Email Bounce-back Diagnostic from May 11, 2025**
- 2. Exhibit B: Notification Email to Oversight and Press Confirming Pattern of Blocking**
- 3. Exhibit C: ISBE Confirmation – Incident #94265 Logged Prior to Communication Suppression**
- 4. Exhibit D: Collinsville CUSD #10 and Guin Mundorf, LLC – Districtwide Email Ban Blocking Plaintiff’s Access to Public Employees and Advocacy Channels**

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Plaintiff,

v.

Collinsville Community Unit School District #10, et al.,
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Case No: 25-CV-842-SPM

**JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF'S CIVIL RIGHTS
COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

EXHIBIT A

Email Communication Blocked by Oversight Agencies and Media Recipients

Date of Attempted Delivery: May 11, 2025

Sender: Jeffrey S. Luffman (jeffrey.luffman@outlook.com)

**Subject Line: Blocked by Oversight Agencies While Having an Open Investigation —
Undisclosed Legal Billing Related to Conflict of Interest (Attorney Tony Dos Santos /
MillerKing LLC) — FOIA Request: Public Expenditures Related to Legal Services and
Case No. 22-DC-325**

Summary:

On Sunday, May 11, 2025, Plaintiff attempted to deliver an email to over 40 recipients, including oversight agencies, public officials, and major investigative journalism outlets. The email contained documentation and commentary concerning:

- Improper conduct by legal actors involved in Plaintiff's state and federal litigation;
- A terminated protective order allegedly used to suppress public speech;
- FOIA-based questions surrounding undisclosed public legal billing;
- Constitutional violations regarding access to public bodies and fair process.

The message was blocked by multiple recipient servers, returning the rejection code:

**"550 5.7.520 Message blocked because it contains content identified as spam.
AS(4810)"**

This suppression occurred across multiple domains, including:

- **Illinois State Board of Education**
- **Illinois Attorney General's Civil Rights Bureau**
- **Madison County government addresses**
- **News organizations** (e.g., ProPublica, NBC, ABC, Reuters, Washington Post, Chicago Tribune, Project Veritas, PBS Frontline)

Example of Blocked Recipient Response:

vbnet

CopyEdit

tsanders@isbe.net

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

Implication:

This blockage constitutes **interference with Plaintiff's First Amendment right to petition government and engage with the public press** concerning matters of substantial public interest. The rejection code AS(4810) appears to relate to **automated content suppression**, despite the email being a lawful, non-commercial, protected communication from a pro se litigant.

This incident has been included in the accompanying **Judicial Notice** to preserve the constitutional and evidentiary implications as part of Plaintiff's ongoing civil rights claims in federal court.

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com

Dated: May 12, 2025

VERIFICATION

I, Jeffrey Luffman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements and information contained in this document and attached exhibits are true and correct to the best of my knowledge, information, and belief.

Executed this 12th day of May, 2025.

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com



Undeliverable: Blocked by Oversight Agencies While Having an Open Investigation Undisclosed Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC Fw: FOIA Request – Public Expenditures Related to Legal Services and C...

From Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@sct-15-20-8534-9-msonline-outlook-d08a8.templateTenant>

Date Sun 05/11/2025 9:09 AM

To tsanders@isbe.net <tsanders@isbe.net>; support <support@isbe.net>; CivilRights <civilrights@ilag.gov>; sainfo@madisoncountyl.gov <sainfo@madisoncountyl.gov>; Brueggemann <mabueggemann@madisoncountyl.gov>; Jennifer J. Zoelzer <jjzoelzer@madisoncountyl.gov>; newsmanager@foxnews.com <newsmanager@foxnews.com>; acortes@bnd.com <acortes@bnd.com>; nbcnews.editors@nbcuni.com <nbcnews.editors@nbcuni.com>; bhundsorfer@capitolnewsillinois.com <bhundsorfer@capitolnewsillinois.com>; jeremy.kohler@propublica.org <jeremy.kohler@propublica.org>; iteam.consumer@abc.com <iteam.consumer@abc.com>; iteam@abc.com <tips@cnn.com>; assignmentdesk@foxnews.com <assignmentdesk@foxnews.com>; wsj.ltrs@wsj.com <wsj.ltrs@wsj.com>; letters@washpost.com <letters@washpost.com>; tips@nbcchicago.com <tips@nbcchicago.com>; abc7chicagotips@abc.com <abc7chicagotips@abc.com>; tips@reuters.com <tips@reuters.com>; dateline@nbcuni.com <dateline@nbcuni.com>

 1 attachment (172 KB)

Blocked by Oversight Agencies While Having an Open Investigation Undisclosed Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC Fw: FOIA Request – Public Expenditures Related to Legal Services and Case No. 22-DC-325;

Delivery has failed to these recipients or groups:

tsanders@isbe.net (tsanders@isbe.net)

Your message wasn't delivered because the recipient's email provider rejected it.

[support](mailto:support@isbe.net) (support@isbe.net)

Your message wasn't delivered because the recipient's email provider rejected it.

[CivilRights](mailto:CivilRights@ilag.gov) (civilrights@ilag.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

sainfo@madisoncountyl.gov (sainfo@madisoncountyl.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[Brueggemann](mailto:Brueggemann@mabueggemann@madisoncountyl.gov) (mabueggemann@madisoncountyl.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[Jennifer J. Zoelzer \(jjzoelzer@madisoncountyiil.gov\)](mailto:jjzoelzer@madisoncountyiil.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[newsmanager@foxnews.com \(newsmanager@foxnews.com\)](mailto:newsmanager@foxnews.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[acortes@bnd.com \(acortes@bnd.com\)](mailto:acortes@bnd.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[nbcnews.editors@nbcuni.com \(nbcnews.editors@nbcuni.com\)](mailto:nbcnews.editors@nbcuni.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[bhundsorfer@capitolnewsillinois.com \(bhundsorfer@capitolnewsillinois.com\)](mailto:bhundsorfer@capitolnewsillinois.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[jeremy.kohler@propublica.org \(jeremy.kohler@propublica.org\)](mailto:jeremy.kohler@propublica.org)

Your message wasn't delivered because the recipient's email provider rejected it.

[iteam.consumer@abc.com \(iteam.consumer@abc.com\)](mailto:iteam.consumer@abc.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[iteam@abc.com \(tips@cnn.com\)](mailto:iteam@abc.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[assignmentdesk@foxnews.com \(assignmentdesk@foxnews.com\)](mailto:assignmentdesk@foxnews.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[wsj.ltrs@wsj.com \(wsj.ltrs@wsj.com\)](mailto:wsj.ltrs@wsj.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[letters@washpost.com \(letters@washpost.com\)](mailto:letters@washpost.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[tips@nbcchicago.com \(tips@nbcchicago.com\)](mailto:tips@nbcchicago.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[abc7chicagotips@abc.com \(abc7chicagotips@abc.com\)](mailto:abc7chicagotips@abc.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@reuters.com (tips@reuters.com)

Your message wasn't delivered because the recipient's email provider rejected it.

dateline@nbcuni.com (dateline@nbcuni.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@theintercept.com (tips@theintercept.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@buzzfeed.com (tips@buzzfeed.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@vice.com (tips@vice.com)

Your message wasn't delivered because the recipient's email provider rejected it.

frontline@pbs.org (frontline@pbs.org)

Your message wasn't delivered because the recipient's email provider rejected it.

info@projectveritas.com (info@projectveritas.com)

Your message wasn't delivered because the recipient's email provider rejected it.

watchdog@ocregister.com (watchdog@ocregister.com)

Your message wasn't delivered because the recipient's email provider rejected it.

news@wbez.org (news@wbez.org)

Your message wasn't delivered because the recipient's email provider rejected it.

press@wbez.org (press@wbez.org)

Your message wasn't delivered because the recipient's email provider rejected it.

newsroom@blockclubchi.org (newsroom@blockclubchi.org)

Your message wasn't delivered because the recipient's email provider rejected it.

WFLDAssignmentDesk@fox.com (WFLDAssignmentDesk@fox.com)

Your message wasn't delivered because the recipient's email provider rejected it.

WFLDWebNews@fox.com (WFLDWebNews@fox.com)

Your message wasn't delivered because the recipient's email provider rejected it.

#491

WLS-TV.website@abc.com (WLS-TV.website@abc.com)

Your message wasn't delivered because the recipient's email provider rejected it.

info@wycc.org (info@wycc.org)

Your message wasn't delivered because the recipient's email provider rejected it.

news@chicagocrusader.com (news@chicagocrusader.com)

Your message wasn't delivered because the recipient's email provider rejected it.

press_publicity@uchicago.edu (press_publicity@uchicago.edu)

Your message wasn't delivered because the recipient's email provider rejected it.

info@chicagoreporter.com (info@chicagoreporter.com)

Your message wasn't delivered because the recipient's email provider rejected it.

newsroom@chicagoreader.com (newsroom@chicagoreader.com)

Your message wasn't delivered because the recipient's email provider rejected it.

news.tips@abc.com (news.tips@abc.com)

Your message wasn't delivered because the recipient's email provider rejected it.

lockbox@washpost.com (lockbox@washpost.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips2@bloomberg.net (tips2@bloomberg.net)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@newyorker.com (tips@newyorker.com)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@revealnews.org (tips@revealnews.org)

Your message wasn't delivered because the recipient's email provider rejected it.

tips@publicintegrity.org (tips@publicintegrity.org)

Your message wasn't delivered because the recipient's email provider rejected it.

civilrightslawyer@ellify.com (civilrightslawyer@ellify.com)

Your message wasn't delivered because the recipient's email provider rejected it.

dalton@riverbender.com (dalton@riverbender.com)

Your message wasn't delivered because the recipient's email provider rejected it.

Diagnostic information for administrators:

Generating server: PH7PR05MB10318.namprd05.prod.outlook.com

tsanders@isbe.net

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

support@isbe.net

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

civilrights@ilag.gov

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

sainfo@madisoncountytill.gov

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

mabueggemann@madisoncountytill.gov

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

jjzoelzer@madisoncountytill.gov

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

newsmanager@foxnews.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

acortes@bnd.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

nbcnews.editors@nbcuni.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

bhundsdorfer@capitolnewsillinois.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

jeremy.kohler@propublica.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

iteam.consumer@abc.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@cnn.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

assignmentdesk@foxnews.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

wsj.ltrs@wsj.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

letters@washpost.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@nbcchicago.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

abc7chicagotips@abc.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@reuters.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

dateline@nbcuni.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@theintercept.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@buzzfeed.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@vice.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

frontline@pbs.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

info@projectveritas.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

watchdog@ocregister.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

news@wbez.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

press@wbez.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

newsroom@blockclubchi.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

WFLDAssignmentDesk@fox.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

WFLDWebNews@fox.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

WLS-TV.website@abc.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

info@wycc.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

news@chicagocrusader.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

press_publicity@uchicago.edu

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

info@chicagoreporter.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

newsroom@chicagoreader.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

news.tips@abc.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

lockbox@washpost.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips2@bloomberg.net

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@newyorker.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@revealnews.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

tips@publicintegrity.org

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

civilrightslawyer@ellify.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

dalton@riverbender.com

Remote server returned '550 5.7.520 Message blocked because it contains content identified as spam. AS(4810)'

Original message headers:

Received: from DS0PR05MB10111.namprd05.prod.outlook.com (2603:10b6:8:ff::12)
by PH7PR05MB10318.namprd05.prod.outlook.com (2603:10b6:510:2f4::5) with
Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8722.24; Sun, 11 May
2025 14:08:49 +0000

Received: from DS0PR05MB10111.namprd05.prod.outlook.com
([fe80::787a:6b8f:e3d2:efa5]) by DS0PR05MB10111.namprd05.prod.outlook.com
([fe80::787a:6b8f:e3d2:efa5%3]) with mapi id 15.20.8722.027; Sun, 11 May 2025
14:08:49 +0000

Content-Type: application/ms-tnef; name="winmail.dat"

Content-Transfer-Encoding: binary

From: Jeffrey Luffman <jeffrey.luffman@outlook.com>

To: "tsanders@isbe.net" <tsanders@isbe.net>, support <support@isbe.net>,
CivilRights <civilrights@ilag.gov>, "sainfo@madisoncountyil.gov"
<sainfo@madisoncountyil.gov>, Brueggemann
<mabrueggemann@madisoncountyil.gov>, "Jennifer J. Zoelzer"
<jjzoelzer@madisoncountyil.gov>

CC: "newsmanager@foxnews.com" <newsmanager@foxnews.com>, "acortes@bnd.com"
<acortes@bnd.com>, "nbcnews.editors@nbcuni.com" <nbcnews.editors@nbcuni.com>,
"bhundsorfer@capitolnewsillinois.com"
<bhundsorfer@capitolnewsillinois.com>, "jeremy.kohler@propublica.org"
<jeremy.kohler@propublica.org>, "iteam.consumer@abc.com"
<iteam.consumer@abc.com>, "iteam@abc.com" <tips@cnn.com>,
"assignmentdesk@foxnews.com" <assignmentdesk@foxnews.com>, "wsj.ltrs@wsj.com"
<wsj.ltrs@wsj.com>, "letters@washpost.com" <letters@washpost.com>,
"tips@nbcchicago.com" <tips@nbcchicago.com>, "abc7chicagotips@abc.com"
<abc7chicagotips@abc.com>, "tips@reuters.com" <tips@reuters.com>,
"dateline@nbcuni.com" <dateline@nbcuni.com>, "tips@theintercept.com"
<tips@theintercept.com>, "tips@buzzfeed.com" <tips@buzzfeed.com>,
"tips@vice.com" <tips@vice.com>, "frontline@pbs.org" <frontline@pbs.org>,
"info@projectveritas.com" <info@projectveritas.com>,
"watchdog@ocregister.com" <watchdog@ocregister.com>, "news@wbez.org"
<news@wbez.org>, "press@wbez.org" <press@wbez.org>,
"newsroom@blockclubchi.org" <newsroom@blockclubchi.org>,
"WFLDAssignmentDesk@fox.com" <WFLDAssignmentDesk@fox.com>,
"WFLDWebNews@fox.com" <WFLDWebNews@fox.com>, "WLS-TV.website@abc.com"
<WLS-TV.website@abc.com>, "info@wycc.org" <info@wycc.org>,
"news@chicagocrusader.com" <news@chicagocrusader.com>,
"press_publicity@uchicago.edu" <press_publicity@uchicago.edu>,
"info@chicagoreporter.com" <info@chicagoreporter.com>,
"newsroom@chicagoreader.com" <newsroom@chicagoreader.com>,
"news.tips@abc.com" <news.tips@abc.com>, "lockbox@washpost.com"
<lockbox@washpost.com>, "tips2@bloomberg.net" <tips2@bloomberg.net>,
"tips@newyorker.com" <tips@newyorker.com>, "tips@revealnews.org"
<tips@revealnews.org>, "tips@publicintegrity.org" <tips@publicintegrity.org>,

#495

"civilrightslawyer@ellify.com" <civilrightslawyer@ellify.com>,
 "dalton@riverbender.com" <dalton@riverbender.com>
 Subject: =?Windows-1252?Q?Blocked_by_Oversight_Agencies_While_Having_an_Open_Inves?=
 =?Windows-1252?Q?tigation_Undisclosed_Legal_Billing_Related_to_Conflict_o?=
 =?Windows-1252?Q?f_Interest_=_96_Attorney_Tony_Dos_Santos_/ _MillerKing_LLC?=
 =?Windows-1252?Q?_Fw:_FOIA_Request_=_96_Public_Expenditures_Related_to_Leg?=
 =?Windows-1252?Q?a_l_Services_and_Case_No._22-DC-325?=
 Thread-Topic: =?Windows-1252?Q?Blocked_by_Oversight_Agencies_While_Having_an_Open_Inves?=
 =?Windows-1252?Q?tigation_Undisclosed_Legal_Billing_Related_to_Conflict_o?=
 =?Windows-1252?Q?f_Interest_=_96_Attorney_Tony_Dos_Santos_/ _MillerKing_LLC?=
 =?Windows-1252?Q?_Fw:_FOIA_Request_=_96_Public_Expenditures_Related_to_Leg?=
 =?Windows-1252?Q?a_l_Services_and_Case_No._22-DC-325?=
 Thread-Index: AQHbwn43rEdQzwDcgkOQAQjZ8wiog==
 X-MS-Exchange-MessageSentRepresentingType: 1
 Date: Sun, 11 May 2025 14:08:48 +0000
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 Return-Path: jeffrey.luffman@outlook.com
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Jeffrey Luffman,
Plaintiff,

v.

Collinsville Community Unit School District #10, et al.,
Defendants.

Case No: 25-CV-842-SPM

**JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF'S CIVIL RIGHTS
COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

EXHIBIT B

Notification of Systemic Email Blocking to Oversight Agencies and Media

Sender:

Jeffrey S. Luffman
jeffrey.luffman@outlook.com
636-675-4864

Date Sent:

Sunday, May 11, 2025 – 9:08 AM CST

Subject Line:

**Blocked by Oversight Agencies While Having an Open Investigation – Undisclosed
Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC
– FOIA Request – Public Expenditures Related to Legal Services and Case No. 22-DC-
325**

Summary of Notice Sent to State and County Authorities:

**On May 11, 2025, Plaintiff issued an email notification to key oversight bodies,
including the Illinois State Board of Education (ISBE) and the Madison County State's
Attorney, regarding unlawful suppression of Plaintiff's civil rights reporting and
communication.**

The body of the email described the following:

- That multiple state and federal oversight agencies, including DOJ Civil Rights, OCR, ARDC, and OEIG, had blocked Plaintiff's messages without justification.
- That the timing of the email suppression occurred immediately after the improper service of a now-terminated Order of Protection (25OP611), which Plaintiff believes was used as pretext to remove or suppress Plaintiff's YouTube journalism platform (JeffFreeTV).
- That Plaintiff had attempted to deliver legal complaints and FOIA-related notices concerning undisclosed billing practices tied to former attorney Tony Dos Santos and MillerKing LLC, and related misuse of public funds.

The email requested a formal acknowledgement and investigation from:

- ISBE
- The Madison County State's Attorney
- Other named agencies that had not yet blocked Plaintiff's communication

The message stated that Plaintiff's First Amendment right to petition is being actively chilled, and warned that failure to act may escalate the matter in federal litigation and public reporting.

Attached/Forwarded Message Identified This Pattern:

"As of May 2, I was served with that invalid order by Deputy Gurley, followed by the near-immediate takedown of my YouTube channel. The fact that every federal communication chain has since gone dark strongly suggests that this case has crossed a threshold—either politically, legally, or both... Constitutionally protected advocacy is being silenced, my civil rights are being actively suppressed, and multiple agencies appear to be avoiding legal responsibility by shutting down digital access."

Plaintiff attached this notification to preserve evidence that further efforts to notify other agencies and media were immediately blocked (as shown in Exhibit A).

Significance:

This exhibit supports Plaintiff's contention that:

- There is a coordinated suppression of protected legal speech,

- That suppression has now spread across government infrastructure and private communication channels, and
 - That this interference is ongoing and tied directly to the central allegations in this matter.
-

End of Exhibit B

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com

Dated: May 12, 2025

VERIFICATION

I, Jeffrey Luffman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements and information contained in this document and attached exhibits are true and correct to the best of my knowledge, information, and belief.

Executed this 12th day of May, 2025.

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com



Blocked by Oversight Agencies While Having an Open Investigation Undisclosed Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC Fw: FOIA Request – Public Expenditures Related to Legal Services and Case No. 22-DC-325

From Jeffrey Luffman <jeffrey.luffman@outlook.com>

Date Sun 05/11/2025 9:08 AM

To tsanders@isbe.net <tsanders@isbe.net>; support <support@isbe.net>; CivilRights <civilrights@ilag.gov>; sainfo@madisoncountyl.gov <sainfo@madisoncountyl.gov>; Brueggemann <mabueggemann@madisoncountyl.gov>; Jennifer J. Zoelzer <jjzoelzer@madisoncountyl.gov>

Cc newsmanager@foxnews.com <newsmanager@foxnews.com>; acortes@bnd.com <acortes@bnd.com>; nbcnews.editors@nbcuni.com <nbcnews.editors@nbcuni.com>; bhundsorfer@capitolnewsillinois.com <bhundsorfer@capitolnewsillinois.com>; jeremy.kohler@propublica.org <jeremy.kohler@propublica.org>; iteam.consumer@abc.com <iteam.consumer@abc.com>; iteam@abc.com <tips@cnn.com>; assignmentdesk@foxnews.com <assignmentdesk@foxnews.com>; wsj.ltrs@wsj.com <wsj.ltrs@wsj.com>; letters@washpost.com <letters@washpost.com>; tips@nbcchicago.com <tips@nbcchicago.com>; abc7chicagotips@abc.com <abc7chicagotips@abc.com>; tips@reuters.com <tips@reuters.com>; dateline@nbcuni.com <dateline@nbcuni.com>; tips@theintercept.com <tips@theintercept.com>; tips@buzzfeed.com <tips@buzzfeed.com>; tips@vice.com <tips@vice.com>; frontline@pbs.org <frontline@pbs.org>; info@projectveritas.com <info@projectveritas.com>; watchdog@ocregister.com <watchdog@ocregister.com>

1 attachment (108 KB)

Follow-Up: Undisclosed Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC Fw: FOIA Request – Public Expenditures Related to Legal Services and Case No. 22-DC-325;

Dear State's Attorney and ISBE Officials,

This message is being sent to notify you that **multiple oversight agencies—both state and federal—have now blocked my attempts to advocate for myself regarding ongoing civil rights violations** stemming from retaliatory actions by Collinsville CUSD #10 and their misuse of government authority to silence protected speech.

Attached/forwarded below is one such communication, sent to the following agencies, which has been **systematically blocked** or rejected:

- U.S. DOJ Civil Rights Division
- OCR (Office for Civil Rights)
- Illinois Attorney General's Civil Rights Bureau (in some cases)
- Illinois Executive Inspector General (OEIG)
- ARDC (regarding ethical misconduct by Dana Bond)
- SCAL (State Complaint Assistance Line)

My previous reports included:

- The terminated **Order of Protection (25OP611)** being used to submit takedown requests against my YouTube journalism platform (**JeffFreeTV**),
- Documented misuse of **FOIA retaliation**,
- And evidence of a **coordinated campaign to suppress First Amendment activity**, particularly surrounding school board and judicial misconduct.

As of **May 2**, I was served with that invalid order by **Deputy Gurley**, followed by the near-immediate takedown of my YouTube channel. The fact that **every federal communication chain has since gone dark** strongly suggests that this case has crossed a threshold—either politically, legally, or both.

At this point, I am notifying your offices that:

- **Constitutionally protected advocacy is being silenced**,
- **My civil rights are being actively suppressed**,
- And **multiple agencies appear to be avoiding legal responsibility** by shutting down digital access.

I am requesting that:

1. You **formally acknowledge** receipt of this pattern of agency obstruction,
2. You **initiate an independent review** of the school district and its legal counsel's actions under color of law,
3. And you respond with clarity as to whether **Madison County or ISBE will assume lead jurisdiction** in investigating this matter before it escalates further in federal court or the national press.

Respectfully,

Jeffrey S. Luffman

Independent Reporter – JeffFreeTV

jeffrey.luffman@outlook.com

636-675-4864

From: Microsoft Outlook

Sent: Thursday, May 08, 2025 2:14 PM

To: laura.maria@iardc.org IARDC Contact; OCR; Auditor General Email; Ethics; Senator Tammy Duckworth; repkatiestuart@gmail.com; criminal.division@usdoj.gov; scail.civil.rights@usdoj.gov

Subject: Undeliverable: Follow-Up: Undisclosed Legal Billing Related to Conflict of Interest – Attorney Tony Dos Santos / MillerKing LLC Fw: FOIA Request – Public Expenditures Related to Legal Services and Case No. 22-DC-325

Delivery has failed to these recipients or groups:

laura.maria@iardc.org IARDC Contact (laura.maria@iardc.org)

Your message wasn't delivered because the recipient's email provider rejected it.

[OCR \(ocr@ed.gov\)](mailto:ocr@ed.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[Auditor General Email \(audgen@auditor.illinois.gov\)](mailto:audgen@auditor.illinois.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[Ethics \(ethics.oeig@ilag.gov\)](mailto:ethics.oeig@ilag.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[Senator Tammy Duckworth \(correspondence@duckworth.senate.gov\)](mailto:correspondence@duckworth.senate.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[repkatiestuart@gmail.com \(repkatiestuart@gmail.com\)](mailto:repkatiestuart@gmail.com)

Your message wasn't delivered because the recipient's email provider rejected it.

[criminal.division@usdoj.gov \(criminal.division@usdoj.gov\)](mailto:criminal.division@usdoj.gov)

Your message wasn't delivered because the recipient's email provider rejected it.

[scail.civil.rights@usdoj.gov \(scail.civil.rights@usdoj.gov\)](mailto:scail.civil.rights@usdoj.gov)

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Diagnostic information for administrators:

Generating server: MN6PR05MB10281.namprd05.prod.outlook.com

laura.maria@iardc.org

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ocr@ed.gov

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repkatiestuart@gmail.com

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criminal.division@usdoj.gov

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Content-Transfer-Encoding: binary
From: Jeffrey Luffman <jeffrey.luffman@outlook.com>
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CB91HanFSalcB206+CqS2tnZHfZWQeQC1qrTnpJLDTMruxWeFWZ5eLdv6Khs3P3gWUaIQEB7/fbgibHhV48vr5td0ofsfc9z
VGda+KyKrb21asVFGfbgSLu/oxabTCoX7/sSNbu0TsZHF09Bk5vrj2MBZyOvfaVl0aDCWxHw9QVYCjUKd1X6TpcUfGsV6q0gr
NZfM4aCEdUInsk/Hxanu7sf1ASVetiWB7QZz23wRzfCvcSboFyQpkku+KpujMXou6xELYdkTiYjeuTtL9RTv6DhxoPBNgm5Ym
d5oH2hvZ433XChF10UVUnsTxefD4gZuMjc8cKnjQqe+sfzKuciWITAExa9XORzVuHwDZNsPmEhw/wrUvi+7a7fAzrDUOtGtIT
i/KaVfBymeEphWWI+hWQwy7IQCHKrVt4KnEYhwwhoQPqdkPbltWrPzvUmo2E50bc/Vy9zzxxdmXFKwb87dQYieJwBRC3ocD0+
891Wm9I1VN9WwQLJtD09u2U77dTuibqUXHLr1HtmTq8fx4j+Q+6r1njWBk9xnPkzqNK608bGTHerNsP/Pq4FisotgZgXvOgk
OYzFdLTrtM4MtHG7qA4hwdw
X-Microsoft-Antispam:

BCL:0;ARA:14566002|12121999007|8062599006|19110799006|7092599006|8060799009|6092099012|1508079900
9|12050799012|461199028|11091999009|14030799003|56899033|7002799012|13095399003|3412199025|440099
028|102099032|2230299032;

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Jeffrey Luffman,
Plaintiff,

v.

Collinsville Community Unit School District #10, et al.,
Defendants.

Case No: 25-CV-842-SPM

**JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF'S CIVIL RIGHTS
COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

EXHIBIT C

**ISBE Confirmation – Incident #94265 Logged Prior to Suppression of Plaintiff's
Communication Rights**

Sender:
support@isbe.net
Recipient:
Jeffrey S. Luffman (jeffrey.luffman@outlook.com)
Date:
Sunday, May 11, 2025 – 7:13 AM CST
Subject:
Incident #94265 has been logged for you

Message Content:

Hi Jeffrey Luffman,

The following new Incident has been logged for you:

Incident Number	Summary	Status
94265	Fw: Civil Rights Suppression and YouTube Takedown Following Terminated Court Order – May 2 Service by Madison County Deputy	Logged

Incident Number	Summary	Status
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**Gurley; Fw: DMCA Counter-Notification and Legal Records
Request – Improper Takedown and Retaliatory Copyright Claim**

Customer Name: Jeffrey Luffman

Description: Forwarding for situational awareness and action.

Summary of Submitted Content:

Plaintiff's original message outlined the following:

- **Service of a now-terminated Order of Protection (25OP611) on May 2, 2025;**
- **Immediate takedown of Plaintiff's YouTube channel JeffFreeTV after service;**
- **Concern that the order was used to suppress constitutionally protected journalistic speech;**
- **Plaintiff's DMCA counter-notification to YouTube and request for legal documentation;**
- **Allegations of ongoing retaliation involving Collinsville CUSD #10, Madison County, and their counsel;**
- **Invocation of violations under:**
 - **42 U.S.C. § 1983 – First Amendment Retaliation**
 - **42 U.S.C. § 1985(3) – Civil Rights Conspiracy**
 - **720 ILCS 5/12-7.1 – Civil Rights Intimidation**
 - **Illinois Constitution – Article I, Sections 4 and 5**
 - **Madison County Home Rule authority**

Plaintiff requested that ISBE and the Madison County State's Attorney acknowledge receipt and initiate a review of possible misconduct by public officials under color of law.

Legal Significance:

This confirmation demonstrates that:

- **Plaintiff's protected advocacy was properly routed and acknowledged by the Illinois State Board of Education before the May 11, 2025 mass email suppression.**
- **The Incident ID (#94265) serves as evidence that Plaintiff was actively participating in the oversight process and not engaged in unlawful or disruptive communication.**
- **Any subsequent digital blocking or suppression of Plaintiff's emails after this incident was logged constitutes retaliation against protected conduct, potentially in violation of Plaintiff's rights under the First and Fourteenth Amendments.**

End of Exhibit C

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com

Dated: May 12, 2025

VERIFICATION

I, Jeffrey Luffman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements and information contained in this document and attached exhibits are true and correct to the best of my knowledge, information, and belief.

Executed this 12th day of May, 2025.

/s/ Jeffrey Luffman

Jeffrey Luffman
Pro Se Plaintiff
212 Camelot Dr.
Collinsville, IL 62040
(636) 675-4864
jeffrey.luffman@outlook.com



Incident# 94265 has been logged for you

From support <support@isbe.net>

Date Sun 05/11/2025 7:13 AM

To jeffrey.luffman@outlook.com <jeffrey.luffman@outlook.com>

Hi jeffrey luffman,

The following new Incident has been logged for you:

Incident # 94265

Summary: Fw: Civil Rights Suppression and YouTube Takedown Following Terminated Court Order – May 2 Service by Madison County Deputy GurleyFw: DMCA Counter-Notification and Legal Records Request – Improper Takedown and Retaliatory Copyright Claim

Customer Name: jeffrey luffman

Location:

Status: Logged

Category:

Description

Forwarding for situational awareness and action

Jeffrey Luffman
6366754864
jeffrey.luffman@outlook.com

From: Jeffrey Luffman

Sent: Sunday, May 11, 2025 7:05 AM

To: sainfo@madisoncountyiil.gov; Brueggemann; Jennifer J. Zoelzer; CivilRights

Cc: newsmanager@foxnews.com; acortes@bnd.com; nbcnews.editors@nbcuni.com; bhundsdorfer@capitolnewsillinois.com; jeremy.kohler@propublica.org; iteam.consumer@abc.com; iteam@abc.com; assignmentdesk@foxnews.com; wsj.ltrs@wsj.com; letters@washpost.com; tips@nbcchicago.com; abc7chicagotips@abc.com; tips@reuters.com; dateline@nbcuni.com; tips@theintercept.com; tips@buzzfeed.com; tips@vice.com; frontline@pbs.org; insidernews@businessinsider.com; info@projectveritas.com; watchdog@ocregister.com; news@wbez.org; press@wbez.org; newsroom@blockclubchi.org; WFLDAssignmentDesk@fox.com; WFLDWebNews@fox.com; WLS-TV.website@abc.com; info@wycc.org; press_publicity@uchicago.edu; info@chicagoreporter.com; editor@chicagodefender.com; newsroom@chicagoreader.com; news.tips@abc.com; lockbox@washpost.com; tips2@bloomberg.net; tips@newyorker.com; tips@revealnews.org; tips@publicintegrity.org; civilrightslawyer@ellify.com; dalton@riverbender.com

Subject: Civil Rights Suppression and YouTube Takedown Following Terminated Court Order – May 2 Service by Madison County Deputy GurleyFw: DMCA Counter-Notification and Legal Records Request – Improper Takedown and Retaliatory Copyright Claim

Dear State's Attorney, ISBE Representatives and IOAG Civil Rights,

This is a formal notification and urgent referral concerning a new and serious development in the ongoing civil rights violations perpetrated by officials connected to Collinsville CUSD #10 and the Madison County court system.

On **May 2, 2025**, I was served with an **Order of Protection (Case No. 25OP611)** by **Deputy Gurley of the Madison County Sheriff's Department**. This order, which was improperly filed in family court by Superintendent **Mark Skertich** and prepared by district attorney **Dana Bond**, was **terminated the same day it was issued**—providing no legal basis for enforcement or further action.

Shortly **after service of this terminated order**, my **YouTube channel, JeffFreeTV**, was taken down without warning. JeffFreeTV is a First Amendment-protected platform where I report as an independent journalist on government transparency, education oversight, and misconduct within Madison County. My speech is political in nature and aimed at public accountability.

This timing strongly suggests that the **invalidated court order was submitted to YouTube**—either directly or via official channels—as justification for the takedown. If true, this constitutes a new act of **civil rights intimidation**, a **deprivation of protected expression under color of law**, and a misuse of court documents to suppress constitutionally protected journalism.

Constitutional and Statutory Violations:

Under the **Illinois Constitution**:

- **Article I, Section 4 (Freedom of Speech)** and
- **Section 5 (Right to Assemble and Petition)**
I have a guaranteed right to speak out on public issues and hold government actors accountable.

Under **Madison County's Home Rule authority**, no official or agency has the power to use government resources or improperly filed court actions to restrict protected expression. The use of this terminated order to suppress my media platform is a direct violation of these principles.

This matter now reflects clear evidence of:

- **42 U.S.C. § 1983** – Deprivation of First Amendment rights under color of law;
- **42 U.S.C. § 1985(3)** – Conspiracy to interfere with civil rights and retaliate against protected speech;
- **720 ILCS 5/12-7.1** – Civil Rights Intimidation under Illinois law.

I am respectfully requesting a full investigation into:

1. Whether anyone in Madison County or Collinsville CUSD #10 submitted Order 25OP611 or the false allegations to DCFS to YouTube or other platforms as a means to suppress my speech;
2. Whether public resources were used to facilitate the takedown or retaliation;
3. Whether the Sheriff's Office was aware that the order had been terminated before service was executed on May 2;
4. Whether public agencies are engaged in coordinated suppression of protected journalistic content.

This YouTube takedown is not just an isolated event—it is part of a **systemic campaign of retaliation and rights suppression**, executed with the help of government resources and fabricated legal process.

I have attached relevant court records and am available to provide documentation, screenshots, and communications upon request.

<https://acrobat.adobe.com/id/urn:aaid:sc:us:819da225-1a24-42f4-8dd5-bcf5fd908f39>

Confirmation of false allegations by DCFS

<https://acrobat.adobe.com/id/urn:aaid:sc:us:9af48765-0e19-4276-a120-a426498c2d70> #512

As you can see this order of protection was filed pro se by the public official Skertich on behalf of public officials Hyre and Bauer in Madison County Family Court but prepared by Collinsville Unit School District Counsel Dana Bond according to the sworn verifications.

This was a clear attempt to deny civil rights and fraud the court. Taxpayer's are paying the legal fees for Skertich to represent himself pro se in family court.

Respectfully,

Jeffrey S. Luffman

Independent Reporter – JeffFreeTV

jeffrey.luffman@outlook.com

636-675-4864

212 Camelot Dr, Collinsville, IL 62234

Jeffrey Luffman

6366754864

jeffrey.luffman@outlook.com

From: Jeffrey Luffman

Sent: Sunday, May 11, 2025 5:10 AM

To: legal@support.youtube.com

Cc: support@youtube.com ; copyright@youtube.com

Subject: DMCA Counter-Notification and Legal Records Request – Improper Takedown and Retaliatory Copyright Claim

To the YouTube Legal Support Team,

I am submitting this message as both a formal counter-notification under the Digital Millennium Copyright Act (17 U.S.C. § 512(g)), and a legal records request related to a recent takedown of my content or channel based on a copyright infringement claim.

My name is Jeffrey S. Luffman, and I operate as an independent reporter and news media influencer under the platform JeffFreeTV, which covers government transparency, education advocacy, and civic news. I operate under the protections of the First Amendment, including freedom of speech and freedom of the press.

Recently, I received a notice from YouTube that my content or channel was removed for an alleged copyright infringement. However, I believe this claim may have been filed fraudulently or in bad faith, and that the takedown may be part of a broader pattern of retaliation connected to a now-terminated Order of Protection (Case No. 25OP611, Madison County, IL), which I suspect was improperly submitted to your platform. The content in question is part of a news series and lawful commentary.

Counter-Notification Information (per 17 U.S.C. § 512(g)(3)):

- My Name: Jeffrey S. Luffman
- Address: 212 Camelot Dr, Collinsville, IL 62234
- Phone: 636-675-4864
- Email: jeffrey.luffman@outlook.com
- URL of Removed Content: <https://youtube.com/@jeffreyluffman3850?si=jYBTCYXTvjt8pFF5>
- Statement: I hereby state, under penalty of perjury, that I have a good faith belief that the content was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled.
- Consent: I consent to the jurisdiction of the Federal District Court for the district in which my address is located (Southern District of Illinois), and I will accept service of process from the person who provided the original

copyright complaint or an agent of such person.

Signature:

Jeffrey S. Luffman

Additional Request for Legal Documentation:

I am also formally requesting that YouTube provide the following records:

1. A copy of the original DMCA/copyright complaint filed against my content.
2. The name and contact information of the complainant, as required under the DMCA.
3. Any legal documentation, law enforcement inquiries, court orders, or moderation requests related to Case No. 25OP611 or any allegation of misconduct that may have affected the status of my account or content visibility.
4. Any content review logs, internal flags, or suppression actions taken by your platform in connection with, my name, or any of my published videos.
5. Confirmation that the now-terminated protective order has been removed from your records and is no longer being used to inform content moderation or platform access.

I have attached a copy of the official termination of the order of protection and a report clearing me of false misconduct allegations related to content involving my daughter.

Please confirm receipt of this notice and provide next steps regarding reinstatement of my content and access to the requested records.

Sincerely,

Jeffrey S. Luffman

jeffrey.luffman@outlook.com

636-675-4864

212 Camelot Dr, Collinsville, IL 62234

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Jeffrey Luffman,
Plaintiff,

v.

Collinsville Community Unit School District #10, et al.,
Defendants.

Case No: 25-CV-842-SPM

**JUDICIAL NOTICE REGARDING SYSTEMIC BLOCKING OF PLAINTIFF'S CIVIL RIGHTS
COMMUNICATIONS TO OVERSIGHT AGENCIES AND PRESS**

EXHIBIT D

**Collinsville CUSD #10 and Guin Mundorf, LLC – Districtwide Email Ban Blocking
Plaintiff's Access to Public Employees and Advocacy Channels**

Sender:

Guin Mundorf, LLC

On behalf of Collinsville Community Unit School District #10

Recipient:

Jeffrey S. Luffman

Date Received:

May 9, 2025

Summary:

On May 9, 2025, Plaintiff received a formal notification from the law firm Guin Mundorf, LLC, acting on behalf of Collinsville CUSD #10, stating that all of Plaintiff's emails to district employees are now being blocked, effective immediately. The ban was issued:

- 1. Without hearing,**
- 2. Without any findings of fact,**
- 3. And without prior notice or an opportunity to be heard.**

The letter included no explanation of cause, no reference to due process protections, and no appeal mechanism.

Summary of Plaintiff's Response to State's Attorney

On the same day, Plaintiff submitted a formal written complaint to the Madison County State's Attorney requesting an immediate investigation into:

- 1. Whether Collinsville CUSD #10 and its legal representatives at Guin Mundorf, LLC coordinated to misuse Home Rule status and government email infrastructure to suppress constitutionally protected communications;**
- 2. Whether this action constitutes retaliation for Plaintiff's protected First Amendment activity, including:**
 - a. FOIA submissions under 5 ILCS 140;**
 - b. Federal civil rights filings in Case No. 25-cv-842-SPM;**
 - c. Ongoing complaints to DOJ Civil Rights, ISBE, and state ethics officials;**
- 3. Whether public funds are being expended unlawfully to enforce prior restraint on a whistleblower, parent, and disabled veteran;**
- 4. Whether this action is part of a pattern of conduct carried out under color of law, in violation of 42 U.S.C. § 1983, the Illinois Constitution, and relevant civil rights statutes including the ADA and Section 504.**

Plaintiff noted that he is:

- 1. The noncustodial parent of a child enrolled in the district with a disability;**
- 2. A federally protected whistleblower with an open DOJ Civil Rights Division complaint (#573509-RDS);**
- 3. A party to pending FOIA and ADA-related grievances regarding the school district and its officials.**

Legal Implications

The districtwide email ban:

- 1. Constitutes a blanket prior restraint on speech and advocacy;**
- 2. Blocks Plaintiff's access to public officials and employees under FOIA, IDEA, and First Amendment protections;**
- 3. Obstructs lawful attempts to petition the government for redress in violation of:**

- a. 42 U.S.C. § 1983 – Deprivation of rights under color of law;
- b. 42 U.S.C. § 1985(3) – Conspiracy to suppress civil rights;
- c. 720 ILCS 5/12-7.1 – Civil rights intimidation;
- d. Illinois Constitution, Article I, Sections 4 and 5;
- e. Illinois Constitution, Article VII, Section 6 (Home Rule Abuse).

Relevance to Judicial Notice

This exhibit supports the Plaintiff's Judicial Notice that a coordinated pattern of retaliation is underway and escalating. While Exhibits A–C establish widespread suppression through email blocking and platform takedowns, Exhibit D demonstrates that a public agency has now directly instructed legal counsel to silence a whistleblowing parent from engaging in any electronic communication with the district—without due process, cause, or lawful authority.

End of Exhibit D

/s/ Jeffrey Luffman

Jeffrey Luffman

Pro Se Plaintiff

212 Camelot Dr.

Collinsville, IL 62040

(636) 675-4864

jeffrey.luffman@outlook.com

Dated: May 12, 2025

VERIFICATION

I, Jeffrey Luffman, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements and information contained in this document and attached exhibits are true and correct to the best of my knowledge, information, and belief.

Executed this 12th day of May, 2025.

/s/ Jeffrey Luffman

Jeffrey Luffman
Pro Se Plaintiff
212 Camelot Dr.
Collinsville, IL 62040
(636) 675-4864
jeffrey.luffman@outlook.com

GUIN MUNDORF

LLC

Attorneys at Law

310 Regency Centre
Collinsville, Illinois 62234
Office: (618) 301-4060
Fax: (618) 301-4080
www.gmschoollaw.com

May 9, 2025

Jeffrey Luffman
212 Camelot Drive
Collinsville, IL 62234

Via Regular U.S. Mail, Via Certified Mail (Return Receipt Requested), and to: jeffrey.luffman@outlook.com

Re: Collinsville Community Unit School District No. 10
Your Emails To the District Will Be Blocked

Dear Mr. Luffman,

Our firm represents Collinsville Community Unit School District No. 10.

On behalf of our client, please be advised the District is blocking all e-mails from you to all District 10 employees, effective immediately.

If you need to correspond with the District for any reason, including future FOIA requests, you should send your correspondence to the following address:

Collinsville CUSD No. 10
Administration Building
201 West Clay Street
Collinsville, Illinois. 62234

Furthermore, the Renfro staff will continue mailing information regarding your daughter's education and important information as it has throughout the school year.

Last, if you would like to speak during the Public Comment portion of a Board Meeting, please contact (618)346-6350 by 9:00 AM the day of the meeting and notify the receptionist. After this occurs, a District staff member will provide you with a number to call at the beginning of the meeting and address the Board during Public Comment.

Sincerely,

Guin Mundorf, LLC

GUIN MUNDORF, LLC



Formal Complaint: Home Rule Abuse and Retaliation via Email Ban – Collinsville CUSD #10 / Guin Mundorf, LLC Fw: Collinsville Community Unit School District No. 10

From Jeffrey Luffman <jeffrey.luffman@outlook.com>

Date Fri 05/09/2025 6:33 PM

To sainfo@madisoncountyl.gov <sainfo@madisoncountyl.gov>; Brueggemann
<mabueggemann@madisoncountyl.gov>

Cc repkatiestuart@gmail.com <repkatiestuart@gmail.com>; Senator Tammy Duckworth
<correspondence@duckworth.senate.gov>; OCR <ocr@ed.gov>; support <support@isbe.net>;
tsanders@isbe.net <tsanders@isbe.net>; laura.maria@iadc.org IARDC Contact <laura.maria@iadc.org>;
Ethics <ethics.oeig@ilag.gov>; scail.civil.rights@usdoj.gov <scail.civil.rights@usdoj.gov>;
criminal.division@usdoj.gov <criminal.division@usdoj.gov>; audgen@auditor.illinois.gov
<audgen@auditor.illinois.gov>; kdoyle@auditor.illinois.gov <kdoyle@auditor.illinois.gov>; CivilRights
<civilrights@ilag.gov>

Bcc civilrightslawyer@ellify.com Youtube <civilrightslawyer@ellify.com>; dalton@riverbender.com
<dalton@riverbender.com>; acortes@bnd.com <acortes@bnd.com>; bhundsorfer@capitolnewsillinois.com
<bhundsorfer@capitolnewsillinois.com>; jeremy.kohler@propublica.org <jeremy.kohler@propublica.org>

📎 1 attachment (182 KB)

Luffman - Notification - May 9 2025.pdf;

Dear Madison County State's Attorney,

Please accept this as a formal request for investigation into unlawful and retaliatory conduct by Collinsville CUSD #10 and its legal counsel Guin Mundorf, LLC.

On May 9, 2025, I received a letter (attached) stating that Collinsville CUSD #10 is blocking all of my emails to every district employee, effective immediately. This directive was issued by their attorney and delivered without hearing, cause, or compliance with procedural due process. As a Home Rule entity under the Illinois Constitution Article VII, Section 6, this action constitutes an abuse of local governmental authority and a violation of both constitutional and statutory rights.

This ban is clearly retaliatory, following my extensive FOIA activity, civil rights complaints 25-CVD-842-SPM, and whistleblower reports involving public corruption, educational neglect, and suppression of IDEA rights. I am the father of a child recently diagnosed with hearing loss enrolled in the district and have an open DOJ CRD case: #573509-RDS.

The district's unilateral censorship and ban:

- Violates First and Fourteenth Amendment protections under 42 U.S.C. § 1983.
- Conflicts with Home Rule limitations, which prohibit local actions that violate state or federal law (IL Const. Art. VII, § 6(i)).
- Obstructs access to public records under 5 ILCS 140 (FOIA).
- Discriminates against me in violation of ADA Title II / 42 U.S.C. § 12132.

- Constitutes prior restraint and retaliation against a law-abiding citizen engaged in oversight and parental advocacy.

I am requesting immediate review of the following:

1. Whether Collinsville CUSD #10 and Guin Mundorf, LLC coordinated to use Home Rule status to block constitutionally protected access and communication;
2. Whether public funds are being misused to suppress the rights of a parent and veteran with an open federal complaint;
3. Whether Dana Bond or other members of Guin Mundorf, LLC acted under color of law to retaliate on behalf of Superintendent Brad Skertich or other district officials.

Again, how are the taxpayers funding this?

Please confirm receipt of this complaint and advise whether your office will open a formal inquiry. I am prepared to provide exhibits, witness affidavits, and FOIA documentation substantiating these claims.

Sincerely,
Jeffrey Luffman
212 Camelot Dr.
Collinsville, IL 62234
6366754864

From: Collinsville Office <collinsvilleoffice@gmschoollaw.com>
Sent: Friday, May 9, 2025 4:01:10 PM
To: jeffrey.luffman@outlook.com <jeffrey.luffman@outlook.com>
Subject: Collinsville Community Unit School District No. 10

Please see attached.

Sincerely,

Guin Mundorf, LLC
Attorneys at Law
310 Regency Centre
Collinsville, IL 62234
Phone: (618) 301-4060
Fax: (618) 301-4080

This email and any attachments thereto is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email and/or any attachments thereto is strictly prohibited. If you have received this email in error, please immediately notify the sender by telephone and email, and permanently delete the original and any copy or printout thereof and any attachments thereto. Your compliance is appreciated.

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Jeffrey Luffman
212 Camelot Dr.
Collinsville, IL 62234
6366754864

From: Collinsville Office <collinsvilleoffice@gmschoollaw.com>